

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE GENZYME CORP.  
SECURITIES LITIGATION

Consolidated No. 09-CV-11267 (GAO)

**INDIVIDUAL DEFENDANTS' MOTION TO DISMISS**

Now come the individual defendants, Mark R. Bamforth, Alison Lawton, Geoffrey McDonough, David P. Meeker, Henri A. Termeer, and Michael S. Wyzga, and move, pursuant to Fed. R. Civ. P. 12(b)(6) and § 21D(b)(3)(A) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(b)(3)(A), for dismissal with prejudice of all claims asserted against them in this action. A memorandum of law and a declaration in support of this motion are being filed herewith.

Respectfully submitted,

MARK R. BAMFORTH, ALISON LAWTON,  
GEOFFREY MCDONOUGH, DAVID P.  
MEEKER, HENRI A. TERMEER AND  
MICHAEL S. WYZGA,

By their attorneys:

/s/ Kathleen E. Cross

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Dated : June 2, 2010

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on June 2, 2010.

/s/ Kathleen E. Cross  
Kathleen E. Cross

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